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Summary of Comments by Citizens for Pennsylvania's Future (PennFuture), Clean Air Council, PennEnvironment, Sierra Club--Pennsylvania Chapter, and American Lung Association in Pennsylvania on Outdoor Wood-Fired Boiler Proposed Rule

Our groups support regulation of outdoor wood-fired boilers (OWBs) by the Department of Environmental Protection (Department). Pollution from OWBs poses significant risks due to high emissions of fine particles and other pollutants. A single OWB can cause fine particle levels exceeding national health standards at a distance of 50 to 150 feet. Fine particles are associated with heart disease, lung disease, and premature death. Part of all of twenty-two Pennsylvania counties already do not meet national health standards for fine particles.

OWBs also cause nuisance (quality of life) effects for neighbors. Across the state, neighbors find they cannot remain in their yards because of smoke and fumes, and even sometimes have watery eyes, sore throats, and burning lungs inside their homes. These neighbors of OWBs need immediate relief.

County and municipal governments are on the front lines of the OWB problem, and we hope they will play a strong role in responding to nuisance air pollution from OWBs. However, few have ordinances targeted at OWBs, enforcement is uneven, and the Department has special expertise in air pollution matters. We urge the Environmental Quality Board (Board) to adopt a statewide rule for enforcement by the Department. This rule should also preserve existing legal remedies for neighbors.

There is ample precedent for Pennsylvania to take action. Other states have responded to OWB pollution with regulations containing similar elements to those proposed here, including setbacks, stack heights, fuel restrictions, prohibitions on the sale of pre-Phase 2 boilers, and notices to OWB purchasers.

An effective rule in Pennsylvania must include a combination of these items, plus several additional elements. Neighbors want to be outside in their yards and have windows open in their homes during the summer, when heating needs from OWBs are also reduced. Therefore, we support the seasonal prohibition on OWB operation between May 1 and September 30. Also, we need an effective way to reduce emissions from older, dirtier OWBs already operating in Pennsylvania. A buyback program could help remove some of these units. Finally, the Department must respond effectively to citizen complaints regarding OWBs, including by enforcement action when appropriate.

We urge the Board to take aggressive action that will protect the public health and prevent nuisances.